

5807 RF 92

States Government

Department of Energy

DATE 11-20-92

Memorandum

Nov 13 2 45 PM '92 Rocky Flats Office

ACTION Benedetti

DIST. LTR ENC

BENEDETTI, R.L.	<input checked="" type="checkbox"/>
BENJAMIN, A.	<input type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>
CARNIVAL, G.J.	<input type="checkbox"/>
CORDOVA, R.C.	<input type="checkbox"/>
CROUCHER, D.W.	<input type="checkbox"/>
DAVIS, J.G.	<input type="checkbox"/>
FERRERA, D.W.	<input type="checkbox"/>
HANNI, B.J.	<input type="checkbox"/>
HEALY, T.J.	<input type="checkbox"/>
HEDAH, T.G.	<input checked="" type="checkbox"/>
HILBIG, J.G.	<input checked="" type="checkbox"/>
IDEKER, E.H.	<input type="checkbox"/>
KIRBY, W.A.	<input type="checkbox"/>
KUESTER, A.W.	<input type="checkbox"/>
LEE, E.M.	<input type="checkbox"/>
MANN, H.P.	<input type="checkbox"/>
MARX, G.E.	<input type="checkbox"/>
McKENNA, F.G.	<input type="checkbox"/>
MORGAN, R.V.	<input type="checkbox"/>
PIZZUTO, V.M.	<input type="checkbox"/>
POTTER, G.L.	<input type="checkbox"/>
RILEY, J.H.	<input type="checkbox"/>
SANDLIN, N.B.	<input type="checkbox"/>
SATTERWHITE, D.G.	<input type="checkbox"/>
SCHUBERT, A.L.	<input type="checkbox"/>
SETLOCK, G.H.	<input type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>
SULLIVAN, M.T.	<input type="checkbox"/>
SWANSON, E.R.	<input type="checkbox"/>
WILKINSON, R.B.	<input type="checkbox"/>
SON, J.M.	<input type="checkbox"/>
E.J.O.	<input type="checkbox"/>

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EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ERD:BKT:11135

RFP Background Soil Characterization

Robert Benedetti, Acting Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

This memorandum is a follow-up to DOE memorandum ERD:BKT:11059, dated December 26, 1991, which requested that EG&G propose a program to characterize RFP and surrounding area soils. EG&G has responded with memoranda 92-RF-0396, 92-RF-1655 and 92-RF-7298. The second of these memoranda included an attachment consisting of a draft proposal for RFP surficial soil characterization. This proposal was the basis for our scoping meeting with the regulators. The latter memorandum recommended that the surficial soil background characterization program provide information to facilitate CERCLA/RCRA risk assessment and the Natural Resource Damage Assessment Regulations located at 43CFR Part 11. DOE/RFO concurs with this recommendation and requests that 43CFR Part 11.62(e) be adequately addressed. With regard to CERCLA/RCRA risk assessment, DOE/RFO requests that both human health and ecological risk assessment are facilitated by this program.

A scoping meeting for RFP surficial soil background characterization was held with the regulators on March 11, 1992. At this meeting, the regulators indicated that a broad spectrum of analytes would be necessary since the RFP RFI/RI program has not proceeded sufficiently toward defining contaminants of concern (COC's). However, it is doubtful that COC's could even be selected without adequate background data on soil background. Thus, a comprehensive analyte list consistent with the Phase I RFI/RI's at the RFP will be appropriate. With regard to sampling and analytical methods, the regulators indicated that both the RFI/RI and background data need to be comparable. DOE/RFO concurs with this. In addition, the regulators indicated that it would be necessary to conduct the background characterization such that both on-site and off-site sampling are achieved. This is a public acceptance issue and DOE/RFO concurs that off-site sampling should be included.

Please find attached an October 26, 1992 letter from CDH to DOE/RFO, requesting that the RFP Background Surficial Soils Study be performed. They have further requested that we provide a reasonable date by which a formal proposal will be submitted to CDH and EPA for review and approval by November 20, 1992.


Reviewed for Addressee
Corres. Control RFP

11-13-92
DATE BY

Ref Ltr. # 0083RF92

We request that EG&G prepare a work package for the background characterization of surficial soils and that it be submitted to DOE/RFO by November 20, 1992. This work package should contain a schedule for the development of a draft and final work plan and a draft and final RFP Background Soil Characterization Report. The EPA Quality Assurance Management staff data quality objective (DQO) process should be used to design the program. An intermediate product of this project should be a Sample and Analysis Plan (SAP) including both a Field Sampling Plan (FSP) and Quality Assurance Addendum to the QAPjP which will be a deliverable to EPA, CDH and the Natural Resource Trustees for review and comment. In addition, since many of the RFP RFI/RI workplans have not properly addressed surficial soils, a proposal should be submitted to DOE/RFO along with the work package on how comparable data will be collected at each of the operable units.

Questions or concerns regarding this memorandum should be directed to Bruce Thatcher of my staff at extension 3532.


James K. Hartman
Assistant Manager
for Environmental Management

Attachment

cc w/Attachment:
F. Lockhart, ERD, RFO
R. Schassburger, ERD, ERD
B. Thatcher, ERD, RFO
S. Grace, ERD, RFO
J. Pepe, ERD, RFO
B. Birk, ERD, RFO
S. Surovchak, ERD, RFO
M. Arndt, EG&G
M. Levin, EG&G
D. Smith, EG&G
M. Guillaume, EG&G
I. Litaor, EG&G
L. Woods, EG&G
S. Nesta, EG&G
R. Ogg, EG&G
E. Dille, EG&G